UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) Case No. CR-20-240-
BOBBY CHRIS MAYES,)
DODDI CIIKIS MATES,)
Defendant.)

DEFENDANT BOBBY CHRIS MAYES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT WRITTEN OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT

COMES NOW, Bobby Chris Mayes ("Chris Mayes") by and through his attorney, Bill Zuhdi, respectfully moves this Honorable Court for an extension of time of twenty-one days in which to submit written objections to the Presentence Investigation Report prepared December 22, 2022. In support, Chris Mayes through counsel states as follows: for a due date of

- 1. The final date to submit written objections to the Presentence Investigation Report is Thursday, January 5, 2023.
- 2. An extension of 21 days in which to submit written objections would make the due date Thursday, January 26, 2023.
- 3. The extension of time is necessary to properly analyze and submit written objections to the Presentence Investigation Report and to address other matters raised in the

Presentence Investigation Report.

- 4. No motion for extension of time to submit written objections to the Presentence Investigation Report has been previously requested.
- 5. The government has no objection to this motion.

WHEREFORE, Chris Mayes respectfully requests the Court grant this motion for extension of time to submit written objections to the Presentence Investigation Report with a due date of Thursday, January 26, 2023.

Respectfully submitted,

s/Bill Zuhdi

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ATTORNEY FOR DEFENDANT BOBBY CHRIS MAYES

Certificate of Service

I hereby certify that on December 30, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

AUSA Thomas Snyder USPO Whitney B. Chakroun *via email* Whitney Chakroun@okwp.uscourts.gov

s/Bill Zuhdi Bill Zuhdi